

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO**

**IN THE MATTER OF THE )  
APPLICATION OF TRI-STATE )  
GENERATION AND TRANSMISSION )  
ASSOCIATION, INC. FOR PUBLIC ) PROCEEDING NO. 25A-\_\_\_\_E  
INTEREST DETERMINATION FOR )  
ENTRY INTO THE SOUTHWEST )  
POWER POOL IN THE WESTERN )  
INTERCONNECTION )**

---

**VERIFIED APPLICATION OF TRI-STATE GENERATION AND TRANSMISSION  
ASSOCIATION, INC. FOR A PUBLIC INTEREST DETERMINATION FOR ENTRY  
INTO THE SOUTHWEST POWER POOL REGIONAL TRANSMISSION  
ORGANIZATION IN THE WESTERN INTERCONNECTION**

---

Tri-State Generation and Transmission Association, Inc. (“Tri-State”), pursuant to Rules 3754 and 3755, respectfully requests a Colorado Public Utilities Commission (“Commission”) finding that the Southwest Power Pool (“SPP”) Regional Transmission Organization (“RTO”) in the Western Interconnection is a Statutory Organized Wholesale Market (“Statutory OWM”)<sup>1</sup> and that Tri-State’s expanded participation in the SPP RTO is in the public interest. In support of this Verified Application (“Application”), Tri-State is contemporaneously filing Direct Testimony and Attachments of three Tri-State witnesses in this proceeding.

**I. PROCEDURAL BACKGROUND**

Senate Bill 21-072, signed into law on June 24, 2021, and codified as § 40-5-108, C.R.S., requires transmission utilities to join an organized wholesale market, as defined by Senate Bill 21-072, by January 1, 2030.

---

<sup>1</sup> Rule 3752(n).

**A. Proceeding No. 22R-0249E**

On June 6, 2022, the Commission issued a Notice of Proposed Rulemaking (“NOPR”) in Proceeding No. 22R-0249E to implement sections of Senate Bill 21-072 and set forth provisions governing participation in wholesale electricity markets. The final rules adopted in that proceeding specify filing requirements for transmission utilities to seek a public interest determination prior to joining wholesale electricity markets and reporting on transmission utility’s plans, commitments, and actual participation in these markets.<sup>2</sup> Tri-State identified its intent to join the SPP RTO in the Western Interconnection within its written comments in that proceeding.<sup>3</sup> The Commission issued its final decision adopting the rules on August 22, 2024<sup>4</sup> and the rules subsequently became effective on October 30, 2024.

**B. Proceeding No. 23M-0195E**

On April 24, 2023, the Commission issued Decision No. C23-0268 in Proceeding No. 23M-0195E which opened a non-adjudicatory proceeding seeking information from Tri-State regarding its intent to participate in the SPP RTO in the Western Interconnection. The Commission requested that Tri-State file a report by June 12, 2023, addressing various topics of interest, including Tri-State’s plans for participation in the SPP RTO with regard to its loads, resources, and transmission expansion, start-up activities, interconnection access, seams issues, emissions tracking, and governance. The Commission also requested additional information from Tri-State demonstrating that the SPP RTO satisfies the ten characteristics set forth in § 40-5-108(1)(a), C.R.S. Tri-State

---

<sup>2</sup> Decision No. C22-0386, at ¶ 2.

<sup>3</sup> See Tri-State Initial Comments filed on September 20, 2022 (Proceeding No. 22R-0249E).

<sup>4</sup> See Decision No. C24-0600.

timely filed its report on June 12, 2023, addressing the topics of interest raised by the Commission. On August 1, 2023, the Commission issued Decision No. C23-0496-I, where the Commission found that it was “premature” at that time to determine whether the market structure of the SPP RTO would meet the statutory criteria set forth in § 40-5-108(1)(a)(I)-(X), C.R.S. and that the purpose of the non-adjudicatory proceeding was only to “inform the Commission and the interested stakeholders regarding the ongoing development of the Federal Energy Regulatory Commission (“FERC”) tariff and structure of the SPP RTO in the Western Interconnection.”<sup>5</sup> On August 7, 2024, the Commission closed the proceeding by minute entry without making a determination or findings.

## **II. TRI-STATE’S FOOTPRINT AND MARKET PARTICIPATION**

Tri-State is a FERC-regulated<sup>6</sup> wholesale electric power generation and transmission cooperative operating on a not-for-profit basis serving its Members’ loads across large portions of Colorado, Nebraska, New Mexico, and Wyoming. Tri-State supplies wholesale electric power to its Member distribution cooperatives and public power districts (collectively, the “Utility Members”) which, in turn, supply retail electric power to residential, commercial, industrial, and agricultural customers. Tri-State meets its wholesale power supply obligations to its Utility Members through a resource portfolio consisting of owned and leased generation facilities, power purchase agreements

---

<sup>5</sup> Decision No. C23-0496-I, at ¶ 15.

<sup>6</sup> Tri-State became subject to FERC’s exclusive jurisdiction under the Federal Power Act on September 3, 2019. [\*Tri-State Generation and Transmission Ass’n\*, 170 FERC ¶ 61,224, ¶ 5, order on reh’g 172 FERC ¶ 61,173, order on reh’g 172 FERC ¶ 61,173 \(2020\), aff’d sub nom. \*United Power, Inc. v. Federal Energy Regulatory Commission\*, 49 F.4th 554 \(D.C. Cir. 2022\)](#). In that decision, the United States Court of Appeals for the District of Columbia Circuit noted that the Federal Power Act “allocates to FERC exclusive jurisdiction over ‘rates and charges ... received ... for or in connection with [transmission or]’ interstate wholesale sales.” [\*United Power, Inc. v. Federal Energy Regulatory Commission\*, 49 F.4th at 562 \(citing \*Hughes v. Talen Energy Mktg., LLC\*, 578 U.S. 150, 163 \(2016\)\)](#).

("PPAs"), and wholesale electricity market transactions. Tri-State's interconnected transmission system operates in both the Western and Eastern Interconnections. Tri-State's interstate transmission facilities are interconnected with those of other utilities, including Western Area Power Administration ("WAPA"), Nebraska Public Power District, Black Hills Colorado Electric, LLC, PacifiCorp, Public Service Company of Colorado ("PSCo"), Platte River Power Authority ("Platte River"), Colorado Springs Utilities ("Colorado Springs"), Basin Electric Power Cooperative ("Basin Electric"), Tucson Electric Power, Public Service Company of New Mexico ("PNM"), El Paso Electric, and Deseret Power ("Deseret"). Tri-State's entire footprint is currently within an energy imbalance market or an RTO. In 2015, Tri-State joined SPP and placed its Eastern Interconnection transmission facilities (including facilities used to serve most of Sedgwick County, in northeastern Colorado) under SPP's tariff (*i.e.*, under SPP's functional control). In the Western Interconnection, Tri-State is a founding member of SPP's Western Energy Imbalance Service ("WEIS") market, having joined on February 1, 2021, together with Basin Electric, Deseret, and three WAPA regions. Similarly, Tri-State began participating in the California Independent System Operator's ("CAISO") Western Energy Imbalance Market ("WEIM") at its inception in 2014 when PacifiCorp's Balancing Authority ("BA") area which includes a portion of Tri-State's Wyoming Utility Member load, joined the newly formed WEIM. Tri-State's market participation expanded on April 1, 2021, when the PNM BA area also joined the WEIM, bringing with it the loads of Tri-State's 11 New Mexico Utility Members. Tri-State has also registered participating resources, and is a Participating Resource Scheduling Coordinator, within the WEIM. When PSCo joined the WEIS market in April 2023, the remaining 20 percent of Tri-State's system-wide load

located within the PSCo BA area, along with associated resources in the BA area, entered the WEIS market. While Tri-State's current market participation is significant, increased participation of Tri-State's load, resources, and transmission assets in an RTO is central to meeting Tri-State's goals for cost-effectively serving its Utility Members, maintaining reliability, and advancing a clean energy resource portfolio.

RTOs generally expand by adding contiguous BA areas, and the associated non-BA utilities and other market participants must enter an RTO with their host BA area, join a different BA area, or create their own BA area. There are currently three BA areas operating in the state of Colorado: (1) the PSCo BA area, the footprint of which is entirely within Colorado; (2) the Western Area Colorado-Missouri ("WACM") BA area, the footprint of which includes portions of Colorado, Wyoming, Western Nebraska, New Mexico, and Arizona; and (3) the SPP RTO BA, the footprint of which includes the small portion of northeastern Colorado that is located within the Eastern Interconnection. Tri-State has load, resources, and transmission assets in all of these BA areas.

In 2023, Tri-State entered into a commitment agreement to transition its load, resources, and transmission assets in the WACM BA area into the SPP RTO effective April 1, 2026.<sup>7</sup> Other entities that have entered into commitment agreements to join the SPP RTO in the Western Interconnection include: Basin Electric, Colorado Springs, Deseret, the Municipal Energy Agency of Nebraska (MEAN), Platte River (which is moving from the PSCo BA area to the new SPP RTO BA area in the west), and the WAPA Upper Great Plains region (currently a BA area), Rocky Mountain region and Colorado

---

<sup>7</sup> During the Tri-State Board Meeting held on May 2, 2023, the Board approved taking all actions necessary to expand Tri-State's participation in the SPP RTO.

River Storage Project (“CRSP”).

### **III. TRI-STATE’S SPP RTO PARTICIPATION**

Tri-State has proactively taken the following steps within the past five years toward SPP RTO participation in the Western Interconnection, while maintaining transparency concerning its progress toward this transition with the Commission and interested stakeholders:

- November 2020 – Tri-State signed a Letter of Intent to evaluate potential participation in a western expansion of the SPP RTO. This was announced via public press release;<sup>8</sup>
- December 2020 – Tri-State’s 2020 Electric Resource Plan (“ERP”) Phase I filing indicated “Tri-State is actively promoting the need for an RTO in the Western Interconnection to reliably interconnect more renewable resources while keeping power affordable”;<sup>9</sup>
- September 2021 – Tri-State’s supplemental Phase I filing to the 2020 ERP stated “... assumptions modeled in Tri-State’s Revised Preferred Plan reflect the expectation of participation in an organized market by the beginning of 2025”;<sup>10</sup>
- January 2022 – Within Settlement Agreement resolving Phase I of its 2020 ERP, Tri-State committed to, among numerous other items, to convene in 2022 at least two stakeholder meetings to discuss organized markets and receive

---

<sup>8</sup>See <https://www.tristate.coop/spp-and-stakeholders-will-consider-rto-expansion-west-study-anticipates49m-annual-savings-current>

<sup>9</sup> Attachment BN-2 at 20 (Proceeding No. 20A-0528E).

<sup>10</sup> Hearing Exhibit 110, Second Supplemental Direct Testimony of Brian L. Thompson at 15 (Proceeding No. 20A-0528E).

stakeholder input;

- September 2022 – Tri-State’s Initial Comments in Proceeding No. 22R-0249E stated “... the next milestone for Tri-State’s participation in the SPP RTO’s western expansion will be for Tri-State to commit by March 1, 2023 ...”<sup>11</sup> Tri-State also convened the first of two stakeholder meetings on organized markets under its 2020 ERP Settlement Agreement, pursuant to Section 3.14.1. During the meeting, Tri-State reiterated that its commitment to move forward with membership in the SPP RTO expansion would be made in March 2023;<sup>12</sup>
- November 2022 – Tri-State convened the second of two stakeholder meetings on organized markets under its 2020 ERP Settlement Agreement, pursuant to Section 3.14.1., which included a presentation by SPP’s Director of Western Services Development on *Stakeholder Participation and Governance in SPP*;
- March 2023 – Tri-State convened an ERP stakeholder meeting in advance of its 2023 ERP Phase I filing, which included a presentation by SPP’s Supervisor, Resource Adequacy Policy providing an *SPP Resource Adequacy Overview*;
- December 2023 – Tri-State provided an update within its Phase ERP Application in Proceeding No. 23A-0585E;
- June 2024 – Tri-State filed an Unopposed Comprehensive Settlement Agreement in its 2023 ERP in Proceeding No. 23A-0585E, which commits Tri-State to including in the five ERP Annual Progress Reports filed after the 2027

---

<sup>11</sup> Tri-State Initial Comments at 15-16.

<sup>12</sup> Those meetings were held on September 7 and November 9, 2022, respectively. Tri-State’s commitment agreement to join SPP RTO in the Western Interconnection became effective June 29, 2023.

ERP, “information on opportunities for Colorado stakeholder participation in SPP regional transmission organization (“RTO”) decision-making processes and RTO impacts to resource adequacy determination, including any changes to load forecast development, planning reserve margin setting, and seams coordination with adjoining non-RTO entities.”

Tri-State’s participation in the SPP RTO expansion into the Western Interconnection will consist of its loads, resources, and transmission assets in the WACM BA area. The loads and resources in the WACM BA area include a portion of Tri-State’s Colorado system, most of Tri-State’s Wyoming system, and all of Tri-State’s Nebraska system connected to the Western Interconnection, as described in more detail below.

**A. Tri-State’s WACM BA Resources**

The Colorado, Nebraska, and Wyoming resources that will transition to the SPP RTO are currently participating in the WEIS market. The current planned resources (or share of resources) that will be transitioned include those identified in Table 1 below.

***Table 1: Tri-State Generation Resources Transitioning to SPP RTO***

<b>Owned Resources</b>
<ul style="list-style-type: none"><li>• Craig Station (CO 648 MW)</li><li>• JM Shafer (CO 272 MW)</li><li>• LRS 2 &amp; 3 (WY 484 MW)</li><li>• Limon 1 &amp; 2 (CO 154 MW)</li><li>• Burlington 1 &amp; 2 (CO 120 MW)</li><li>• Axial Basin Solar (CO 145 MW)</li><li>• Dolores Canyon Solar (CO 110 MW)</li></ul>
<b>PPA Resources</b>
<ul style="list-style-type: none"><li>• Carousel Wind (CO 150 MW)</li><li>• Colorado Highlands Wind (CO 94 MW)</li><li>• Kit Carson Wind (CO 51 MW)</li><li>• Crossing Trails Wind (CO 104 MW)</li><li>• Niyol Wind (CO 200 MW)</li><li>• Garland Canal Hydro (WY 3 MW)</li></ul>



Contracts
<ul style="list-style-type: none"><li>• Basin AU/STY (CO 149 MW)<sup>13</sup></li><li>• Basin SGW (WNE 119 MW)</li><li>• CRSP Hydro (CO/WY 151 MW, LAP Hydro – (CO/WY 278 MW, WNE 71 MW)</li></ul>

## **B. Tri-State's WACM BA Transmission Assets**

The majority<sup>14</sup> of the transmission assets that will transition to the SPP RTO are currently located within the WACM BA area. This includes the majority of Tri-State's transmission system in Colorado and Wyoming, which includes all 345 kV and 230 kV transmission assets from Laramie River Station in Wyoming, all transmission assets in Western Colorado, and all transmission assets located along the Front Range and in eastern Colorado located north of Midway and Lamar Substations. In total, this will include over 800 miles of 345 kV transmission, over 600 miles of 230 kV transmission, over 200 miles of 138 kV transmission, over 1,500 miles of 115 kV transmission, and more than 200 substations and switching stations. A map of Tri-State's current planned transmission assets entering SPP is provided as **Attachment A**, and a map of Tri-State's current planned transmission assets with other utilities' transmission assets who are expected to enter SPP RTO, is provided as **Attachment B**.

## **C. Tri-State's WACM BA Loads**

Twenty-three of Tri-State's forty Utility Members have load metered through points within the WACM BA area, or on PRPA's transmission system that will transition to being served through the SPP RTO, as shown in Table 2 below. This represents 67 percent of

---

<sup>13</sup> Contract can be delivered/used to serve load in PSCo BA or WACM BA.

<sup>14</sup> Select transmission assets located within the PSCo BA and along a boundary between the PSCo and WACM BA area that will also transition to the SPP RTO.

the gross load across the Tri-State system.<sup>15</sup>

**Table 2: Tri-State Load Transitioning to SPP RTO**

State <sup>16</sup>	TS Member Load in WACM BA	Portion of TS Member Load in WACM BA
Colorado	<ul style="list-style-type: none"> <li>Gunnison County REA</li> <li>Morgan County REA</li> <li>White River Electric</li> <li>Y-W Electric</li> </ul>	<ul style="list-style-type: none"> <li>Empire</li> <li>Highline<sup>17</sup></li> <li>Southeast Colorado</li> <li>KC Electric</li> <li>Mountain View</li> <li>San Miguel</li> <li>Poudre Valley REA</li> </ul>
Wyoming	<ul style="list-style-type: none"> <li>Garland Light &amp; Power</li> <li>Niobrara</li> <li>Wheatland REA</li> <li>Wyrulec</li> </ul>	<ul style="list-style-type: none"> <li>Big Horn</li> <li>Carbon Power &amp; Light</li> <li>High Plains</li> <li>High West</li> </ul>
Nebraska	<ul style="list-style-type: none"> <li>Roosevelt Public Power District</li> </ul>	<ul style="list-style-type: none"> <li>Chimney Rock<sup>18</sup></li> <li>Wheatbelt<sup>19</sup></li> </ul>
New Mexico		<ul style="list-style-type: none"> <li>Jemez Mountains Electric Cooperative*</li> </ul>

\*Singular load point on the BA seam.

#### IV. TESTIMONY AND ATTACHMENTS SUPPORTING THIS APPLICATION

The following Tri-State witnesses are sponsoring Direct Testimony and Attachments in support of this Application:

1. Mr. Daniel Walter, Vice President, Energy Markets and Settlements, addresses RTO market operations and benefits;
2. Mr. Ryan Hubbard, Senior Manager, Transmission Business Strategy, addresses

<sup>15</sup> Load percentage is based on forecasted gross member load energy requirements for Tri-State in the WACM BA area as compared to total Tri-State system load in 2026. Load related to Member Systems expected to exit prior to 2026 are removed from the calculation.

<sup>16</sup> The state listed is the one in which the member has the greatest share of load. Members such as Wyrulec and High West have load in multiple states.

<sup>17</sup> Tri-State Member already has load in SPP RTO (east).

<sup>18</sup> Tri-State Member already has load in SPP RTO (east).

<sup>19</sup> Tri-State Member already has load in SPP RTO (east).

RTO transmission planning and generator interconnection procedures; and

3. Ms. Lisa Tiffin, Senior Vice President, Energy Management addresses GHG tracking and reporting in the RTO and the market's resource adequacy constructs.

A compliance matrix identifying where OMW rule criteria are addressed, in this Application or witness testimony, is provided as **Attachment C**.

## **V. REQUESTED APPROVALS**

By this Application, Tri-State requests that the Commission:<sup>20</sup>

1. Issue a finding that the SPP RTO is a statutory OWM as defined in Rule 3752(n) and pursuant to Rule 3754(d) that Tri-State's decision to expand its participation in the SPP RTO is in the public interest.

2. In the alternative, if the Commission does not make the findings requested in (1):

- a. Find that the SPP RTO satisfies the characteristics specified in subparagraphs 3754(d)(I) through (III), and, therefore, pursuant to Rule 3754(e), Tri-State's decision to expand its participation in the SPP RTO is in the public interest, and
- b. Grant, to the extent necessary and consistent with the public interest determination, a waiver of the requirement to join a statutory OWM on or before January 1, 2030, in accordance with § 40-5-108(2), C.R.S. and Rule 3756.

3. In the alternative, if the Commission does not make the findings requested

---

<sup>20</sup> Tri-State submits this Application without prejudice to or waiver of any of its rights or jurisdictional claims under the Federal Power Act. 16 U.S.C. §§ 791a-825r (2018).

in (1) or (2), find that good cause exists for a waiver in accordance with § 40-5-108(2), C.R.S. and Rule 3756, and grant such a waiver.

## VI. INFORMATION REQUIRED BY RULE 3755

### A. Rule 3755(a) Market Overview

On June 4, 2024, SPP submitted to FERC proposed revisions<sup>21</sup> to its Open Access Transmission Tariff (“OATT” or “Tariff”), Bylaws, and Membership Agreement to facilitate the commitment of nine entities in the Western Interconnection—including Tri-State (the “Expansion Members”)—to join the SPP RTO as transmission owners, place their transmission facilities under SPP’s functional control, and/or begin taking services under SPP’s OATT<sup>22</sup> by April 1, 2026.<sup>23</sup> On March 20, 2025, FERC approved, subject to condition, SPP’s proposed revisions, finding that they “are **just and reasonable** and not unduly discriminatory or preferential.”<sup>24</sup> FERC directed SPP to make certain compliance and informational filings in connection with the approval.<sup>25</sup> On April 16, 2025, SPP submitted its compliance filing related to the approval.<sup>26</sup>

Tri-State addresses each sub-requirement of Rule 3755(a)’s Market Overview requirement<sup>27</sup> in turn below:

---

<sup>21</sup> Effective versions of SPP governing documents are available at <https://www.spp.org/spp-documents-filings/?id=18162>. SPP’s effective OATT is available at <https://sppviewer.etariff.biz/dashboard>.

<sup>22</sup> Southwest Power Pool, Inc., Submission of Revisions to Tariff, Bylaws, and Membership Agreement to Expand the Regional Transmission Organization into the Western Interconnection (Part 1 of 2), Docket No. ER24-2184-000 (June 4, 2024) (the “SPP Expansion Filing”) and Part 2 of 2, Docket No. ER24-2185-000 (June 4, 2024).

<sup>23</sup> SPP Expansion Filing at 2, 7.

<sup>24</sup> *Sw. Power Pool, Inc.*, 190 FERC ¶ 61,169 (2025) (emphasis added).

<sup>25</sup> *Id.*

<sup>26</sup> *Sw. Power Pool, Inc.*, Compliance Filing Revising SPP Tariff in Response to the March 20 Order, Docket No. ER24-2184-001 (April 16, 2025).

<sup>27</sup> For a summary of the history and background of SPP, see the SPP Expansion Filing at 8-12.

1. A description of all market services included in the proposed market.

Because the Expansion Members will be joining the full SPP RTO, all of the services offered by the RTO will be included in the proposed market. These services are described in SPP's Tariff and include:

- **Transmission Service Provider.** SPP will administer transmission service, transmission planning and expansion, and generation interconnection service under its Tariff.
- **Market Operations.** SPP administers the Integrated Marketplace, a centralized Day-Ahead and Real-Time Energy and Operating Reserve market with locational marginal pricing and market-based congestion management.<sup>28</sup>
- **Planning Coordinator.** SPP functions as the planning coordinator subject to applicable North American Electric Reliability Corporation ("NERC") Reliability Standards.<sup>29</sup>
- **Reliability Coordinator.** SPP functions as the reliability coordinator subject to applicable NERC Reliability Standards.<sup>30</sup>
- **Balancing Authority.** SPP functions as the balancing authority subject to applicable NERC Reliability Standards.<sup>31</sup>
- **Interchange Authority.** SPP functions as the interchange authority subject to applicable NERC Reliability Standards.<sup>32</sup>

---

<sup>28</sup> See *Sw. Power Pool, Inc.*, 146 FERC ¶ 61,130 (2014) (approving the start-up and operation of the Integrated Marketplace effective March 1, 2014).

<sup>29</sup> See SPP Expansion Filing at 1012.

<sup>30</sup> See SPP Expansion Filing at 1012.

<sup>31</sup> See SPP Expansion Filing at 1012.

<sup>32</sup> See SPP Expansion Filing at 1012.

2. A map and description of the current scope of the market including a list of participating entities, description of the scope of generation and transmission assets currently participating, and a forecast of anticipated participation in the market.

A map of the SPP RTO market and expansion is provided as **Attachment D**. SPP currently has a service territory of 557,546 square miles across 14 states. In its Integrated Marketplace, SPP has 348 members.<sup>33</sup> As of January 2025, SPP includes 1,007 generating plants, 5,292 substations, and 72,884 miles of transmission located in its Integrated Marketplace. SPP's Integrated Marketplace has a nameplate capacity of 103,614 MW as of January 2025 and an accredited capacity of 63,908 MW as of Summer 2024.<sup>34</sup> SPP anticipates participation in the SPP RTO in the Western Interconnection from Basin Electric, Colorado Springs, Deseret, MEAN, Platte River, Tri-State, and WAPA.<sup>35</sup>

3. A description of greenhouse gas emission or clean energy policies applicable to both Colorado and, to the extent reasonably practicable, non-Colorado market participants.

SPP has approved GHG tracking and reporting protocols in place, as developed by the Integrated Marketplace Greenhouse Gas Task Force ("IMGHGTf"), to enable electing Market Participants to track their GHG, supporting compliance with Colorado's (and other states') GHG programs.<sup>36</sup> This is further discussed in the Direct Testimony of Tri-State witness Lisa Tiffin.

4. A description of terms and conditions for market entry and exit.

Entry into the SPP RTO is described in the SPP Bylaws as follows:

---

<sup>33</sup> A full list of SPP members can be found here: <https://www.spp.org/about-us/members-market-participants/>.

<sup>34</sup> See <https://www.spp.org/about-us/fast-facts/>.

<sup>35</sup> See <https://www.spp.org/western-services/rto-expansion/>.

<sup>36</sup> See Integrated Marketplace GHG Task Force: <https://www.spp.org/stakeholder-groupslist/organizational-groups/board-of-directorsmembers-committee/markets-and-operations-policy-committee/market-working-group/integrated-marketplace-ghg-taskforce/>.

Membership in SPP is voluntary and is open to any electric utility, Federal Power Marketing Agency, transmission service provider, any entity engaged in the business of producing, selling and/or purchasing electric energy for resale, and any entity willing to meet the membership requirements, including execution of the Membership Agreement. Membership also is open to any entity eligible to take service under the SPP OATT. These entities desire the greater efficiency and service reliability gained through better coordination by voluntary association in SPP as constituted herein and in the SPP Articles of Incorporation. Members recognize that such association has a significant effect upon the availability and reliability of the bulk electric power supply of the region, and thereby affects the reliability of the nation's electric power supply.<sup>37</sup>

Exit from the SPP RTO may be accomplished according to the terms of the Membership Agreement, which provide for certain procedures to terminate membership and describe certain obligations that apply upon termination.<sup>38</sup>

5. A description of generation and transmission bidding procedures and requirements.

SPP evaluates Offers<sup>39</sup> submitted by Market Participants for use in the Day-Ahead Market and Offers submitted for use in the Day-Ahead Reliability Unit Commitment ("RUC") to ensure sufficient resources are committed to meet the projected obligation and operating reserve requirements for the upcoming Operating Day.<sup>40</sup> For the Intra-Day RUC, SPP evaluates Offers to ensure resources are committed to meet each SPP BAA's projected obligation and operating reserve requirement through the Operating Day. In

---

<sup>37</sup> Available at <https://sppviewer.etariff.biz/tariff>.

<sup>38</sup> See Section 4 of SPP's Membership Agreement, available at <https://sppviewer.etariff.biz/tariff>.

<sup>39</sup> Offer is defined as "[a] commitment to sell (i) a quantity of Energy at a specific minimum price such as a Resource Offer, a Virtual Energy Offer and/or an Import Interchange Transaction Offer, or (ii) a quantity of Transmission Congestion Rights at a specific minimum price, where such quantities may be submitted in 0.1 MW increments."

<sup>40</sup> Operating Day is defined as "[t]he daily period beginning at midnight for which transactions within SPP are scheduled."

carrying out these processes, SPP will commit resources on a least cost security constrained basis and will clear energy and operating reserve in the Day-Ahead Market based on a security constrained economic dispatch (“SCED”). Similarly, SPP executes the Real Time Balancing Market (“RTBM”) by dispatching energy and clearing operating reserve on resources on the bases of a SCED. Additionally, SPP will conduct the annual Auction Revenue Right (“ARR”) allocation, annual Transmission Congestion Rights (“TCR”) auction, monthly ARR allocation and monthly TCR auction. Further information regarding generation and transmission bidding procedures can be found in Attachment AE to SPP’s Tariff; specifically, sections 3, 5, 6, and 7.<sup>41</sup> In addition, please reference SPP’s Integrated Marketplace Protocols.<sup>42</sup>

6. A description of provisions and procedures for self-scheduling of resources.

Market Participants may submit Offers for use in the Day-Ahead Market and RTBM up to seven days prior to the Operating Day. Day-Ahead Market Offers may be updated up to the close of the Day-Ahead Market and RTBM Offers may be updated thirty minutes prior to each Operating Hour.<sup>43</sup> Market Participants must specify a resource commitment status and a resource dispatch status as part of the Offer using the data formats, procedures, and information defined in Section 4.2.2 of SPP’s Market Protocols. Additional information regarding self-scheduling of resources can be found in Attachment AE to SPP’s Tariff.

---

<sup>41</sup> Available at <https://sppviewer.etariff.biz/tariff>.

<sup>42</sup> Available at <https://www.spp.org/spp-documents-filings/?id=20867>.

<sup>43</sup> Operating Hour is defined as “[a] 60-minute period of time during the Operating Day corresponding to a clock hour, typically expressed as hour-ending.”



7. A description of generation unit commitment procedures.

SPP begins the Day-Ahead RUC process by 1345, or 45 minutes following the posting of the Day-Ahead market results, whichever is later, to assess capacity adequacy during the Day-Ahead period and the remainder of the current Operating Day. The Day-Ahead RUC consists of four steps: “(1) process RUC inputs; (2) execute RUC algorithm; (3) evaluate and communicate RUC results; and (4) update Current Operating Plan as needed.” Further information on SPP’s Day-Ahead RUC process can be found in Section 4.3.2 of SPP’s Integrated Market Protocols.

SPP performs Intra-Day RUCs at least every four hours. SPP continually assesses the need for an Intra-Day RUC for the current Operating Day and the approved Day-Ahead period. Although the minimum Intra-Day RUC obligation is every four hours, SPP also solves Intra-Day RUC up to fifteen minutes before real-time. The Intra-Day RUC follows the same steps described above for the Day-Ahead RUC. Please reference section 4.4.1 of SPP’s Integrated Marketplace Protocols for further details about Intra-Day RUC procedures. Additionally, further information regarding generation unit commitments can be found in Attachment AE to SPP’s Tariff.

8. A description of accounting for load served and generation provided.

SPP accounts for load served and generation provided through a Scheduled Settlement Statement.<sup>44</sup> SPP issues a preliminary Scheduled Settlement Statement for an Operating Day no later than seven calendar days following the applicable Operating

---

<sup>44</sup> Scheduled Settlement Statement is defined as “[a] daily summary of the SPP Integrated Marketplace’s total daily charges and credits by charge type and Operating Day (OD), generated for each Asset Owner and containing data for all of the ODs settled, either on an initial, final, or resettlement basis, on a single settlement execution day. The current, previous, and net amounts are included on each OD’s statement.”

Day. SPP issues a second Scheduled Settlement Statement for an Operating Day no later than fifty-three calendar days following the applicable Operating day. A final Scheduled Settlement Statement for an Operating Day is provided no later than 120 calendar days after the applicable Operating Day. Settlements associated with a specific Operating Day are considered final at the end of the three hundred sixty-fifth calendar day following the applicable Operating Day. Settlement Statements are configurable by Market Participants to show hourly net amounts or to show that Market Participant's hourly and sub-hourly billing quantities at each settlement location to be paid or credited resulting from the DA Market and RTBM settlements. SPP issues invoices detailing all charges and payments on a weekly basis. For further information, please reference Attachment AE to SPP's Tariff and SPP's Integrated Marketplace Protocols, in particular, Section 10 of Attachment AE and Section 4.5 of the Integrated Marketplace Protocols.

9. A description of transmission congestion processes.

Transmission congestion processes are discussed in the Direct Testimony of Daniel T. Walter. Additionally, economic congestion from a transmission planning perspective is addressed in the Direct Testimony of Tri-State witness Ryan J. Hubbard. For further information, please reference Attachment AE to SPP's Tariff and SPP's Integrated Marketplace Protocols, in particular, Section 7 of Attachment AE and Sections 3.2, 4.4, 4.5, and 5 of the Integrated Marketplace Protocols.

10. A description of policies regarding the promotion of clean energy resources, including: (1) policies regarding the promotion of load flexibility and demand-side resources; (2) policies and procedures for capacity accreditation of resources including thermal and renewable resources; and (3) policies regarding the participation of distributed

energy resources in energy markets, including compliance with the requirements of FERC Order 2222.

SPP's policies on demand-side resources are described in Attachment AA to SPP's OATT and Business Practice 8100 to SPP's OATT. Demand-side resources are classified as dispatchable demand-side resources or non-dispatchable demand-side resources. Dispatchable demand-side resources can participate in the Integrated Marketplace and are treated similarly to other resources, with specific registration and performance requirements. Non-dispatchable demand-side resources can be considered in a Load Serving Entity's ("LRE") forecasted peak demand calculation.

Capacity accreditation of thermal and renewable resources is described in Attachment AA to SPP's OATT and Section 7 of SPP's Planning Criteria Document.<sup>45</sup> LRE's are required to fill out and submit a workbook detailing their capacity plans for the upcoming year by February 15. As part of the annual workbook submission, an LRE with Deliverable Capacity from resources internal to the SPP BA area can qualify capacity by:

- (a) registering the Resource in the Integrated Marketplace; (b) submitting, or causing to be submitted, to the Transmission Provider the current Operational Test results as performed in accordance with the SPP Planning Criteria; and (c) submitting, or causing to be submitted, to the Transmission Provider the current Capability Test results as performed in accordance with the SPP Planning Criteria.

SPP requires capability tests on generating units to determine the Net Generating Capability.<sup>46</sup> Capability test requirements vary by resource; for example, thermal units

---

<sup>45</sup> See <https://www.spp.org/documents/69546/spp%20planning%20criteria%20v4.1.pdf> for SPP Planning Criteria.

<sup>46</sup> Net Generating Capability is defined as "[t]he maximum load-carrying ability of the equipment, exclusive of station use, under specified conditions for a given time interval, independent of the characteristics of the load. Capability is determined by design characteristics, physical conditions, adequacy of prime mover,

must perform a capability test every five years during the summer season, conventional & pumped storage hydro units must perform a capability test every five years during the summer season, and energy storage units must perform a capability test every three years during the summer season and must be tested to the time duration they are accredited. For solar and wind units, SPP evaluates the net planning capacity monthly. In addition, SPP requires annual operational tests on resources to demonstrate the functional ability of a resource.

SPP's policies on distributed energy resources are described in Attachment AA to SPP's OATT. An LRE claiming firm capacity from behind the meter generation<sup>47</sup> less than 10 MW internal to the SPP BA area can qualify capacity by:

(a) being controlled or dispatched by an Load Responsible Entity or Market Participant; (b) submitting, or causing to be submitted, to the Transmission Provider the appropriate reporting and documentation requirements in accordance with the SPP Business Practices; (c) submitting, or causing to be submitted, to the Transmission Provider the current Operational Test results as performed in accordance with the SPP Planning Criteria; (d) submitting, or causing to be submitted, to the Transmission Provider the current Capability Test results as performed in accordance with the SPP Planning Criteria; and (e) demonstrating that there is firm delivery from the internal resource(s) to the LRE's load.

SPP's FERC Order No. 2222 Compliance Filing is currently pending before FERC in Docket No. ER22-1697.

11. A description of policies and operational practices regarding seams with adjoining regional markets, including policies regarding the

---

energy supply, and operating limitations such as cooling and circulating water supply and temperature, headwater and tailwater elevations and electrical use."

<sup>47</sup> "Behind the meter" refers to electricity before it hits the meter on the transmission system wires.

reduction of costs and inefficiencies of transactions between  
balancing areas and between marketing constructions.

SPP’s Seams Advisory Group (“SAG”)<sup>48</sup> is responsible for providing direction, guidance, and advice to SPP Organizational Groups, advisory groups, user forums, and staff regarding issues impacting or being impacted by SPP’s seams agreements, joint operating agreements, or arrangements with neighboring transmission providers, transmission owners, or customers. These agreements are available through SPP’s Rate Schedules and Seams Agreements Tariff and describe specific operational practices.<sup>49</sup>

For reference, SPP has seams agreements with Associated Electric Cooperative Incorporated (“AECI”), Midcontinent Independent System Operator (“MISO”), Saskatchewan Power Corporation (“SaskPower”), Tennessee Valley Authority (“TVA”), California Independent System Operator (“CAISO”), Electric Reliability Council of Texas (“ERCOT”), and PSCo. Table 3 below summarizes the seams agreements by entity type.

**Table 3: SPP Seams Agreements by Entity Type**

<b>Seams Agreements</b>	<b>RC &amp; MO</b>	<b>TSP</b>	<b>BA</b>
Data Sharing	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Congestion Management	<input checked="" type="checkbox"/>		
Coordinated Emergency Response	<input checked="" type="checkbox"/>		
Outage Coordination	<input checked="" type="checkbox"/>		
Joint Transmission Planning		<input checked="" type="checkbox"/>	
Coordination of ATC & Transmission Service Admin		<input checked="" type="checkbox"/>	
Alloc. of Cost for Transm. Exp.		<input checked="" type="checkbox"/>	
Coordinated Emergency Response			<input checked="" type="checkbox"/>

<sup>48</sup> See <https://www.spp.org/stakeholder-groups-list/advisory-groups/seams-advisory-group/>

<sup>49</sup> Available at <https://sppviewer.etariff.biz/tariff>.

Attachment O to SPP's Tariff, which provides a description of SPP's transmission planning process, also includes requirements to coordinate interregional transmission planning with adjacent planning regions, including as required under FERC Order No. 1000.

Additionally, SPP has indicated that it will utilize the existing FERC-approved Western Interconnection Unscheduled Flow Mitigation Plan ("WIUFMP"), as applicable, as one method of coordinated congestion management between neighboring regions. WIUFMP functions to mitigate high levels of parallel flows on Qualified Paths (a transmission element or group of elements) using a curtailment matrix of contributing schedules and the use of Qualified Controllable Devices (phase shifters).<sup>50</sup> SPP also intends to work with neighboring Reliability Coordinators, Transmission Service Providers, and Balancing Authorities to address specific coordinated congestion management through bilateral agreements to bridge the gap between April 1, 2026 and the implementation of a more comprehensive Western Interconnection congestion management process that is currently being considered by the North American Energy Standards Board ("NAESB").<sup>51</sup>

12. A description of other market processes and requirements as appropriate.

Please reference SPP's Tariff,<sup>52</sup> Business Practices,<sup>53</sup> and Integrated Marketplace Protocols.<sup>54</sup>

---

<sup>50</sup> See

<https://www.spp.org/documents/64088/wiufmp%20step%204%20curtailment%20methodology.pdf>.

<sup>51</sup> See [https://www.naenot.sb.org/pdf4/weq\\_bps\\_WICM022025w1.pdf](https://www.naenot.sb.org/pdf4/weq_bps_WICM022025w1.pdf).

<sup>52</sup> Available at <https://sppviewer.etariff.biz/tariff>.

<sup>53</sup> Available at <https://www.spp.org/Documents/64300/SPP%20OATT%20Business%20Practices.zip>.

<sup>54</sup> Available at <https://www.spp.org/spp-documents-filings/?id=20867>.

13. A description of greenhouse gas emission or clean energy policies applicable to both Colorado and, to the extent reasonably practicable, non-Colorado market participants.

Please see (3) above and the Direct Testimony of Tri-State witness Lisa Tiffin.

**B. Rule 3755(b) FERC Dockets**

SPP RTO is currently operating as a FERC-approved RTO.<sup>55</sup> As described above, in 2024, SPP proposed the necessary changes to its Governing Documents to allow the Expansion Members to execute Membership Agreements,<sup>56</sup> to place their respective transmission facilities under SPP's Tariff, and/or begin taking member services from SPP. This proposed expansion of the SPP RTO footprint will expand the SPP BA to include the Eastern Interconnection, the Western Interconnection, and the West DC Ties. On March 20, 2025, FERC approved SPP's tariff within SPP's Expansion Filing in Docket Nos. ER24-2184 and ER24-2185.

**C. Rule 3755(c) Transmission Control**

SPP exercises functional control over transmission facilities owned by Transmission Owners ("TOs") that are members of SPP. Under the SPP Membership Agreement, TOs transfer functional control of their Tariff Facilities to SPP while retaining legal and equitable ownership. This transfer enables SPP to administer transmission service, direct the operation of the grid, and ensure compliance with reliability standards, including those set forth by NERC. SPP schedules transactions, coordinates with neighboring systems, manages reliability, and administers transmission service under its OATT.

---

<sup>55</sup> *Sw. Power Pool, Inc.*, 146 FERC ¶ 61,130 (2014) (approving the start-up and operation of the Integrated Marketplace effective March 1, 2014).

<sup>56</sup> Tri-State has executed a Membership Agreement with SPP.

Unlike transmission facilities, generation facilities in the SPP RTO remain under the operational and legal control of their respective owners. SPP does not own, control, or dispatch generation units but does coordinate generation operations as part of its reliability functions. In the SPP Integrated Marketplace, market participants submit bids, and SPP optimizes economic dispatch to balance supply and demand.

SPP maintains Standards of Conduct<sup>57</sup> that apply to the conduct of its directors, officers, employees, contractors, and agents. The Standards of Conduct ensure independence, fairness, and confidentiality in administering transmission services by, among other things, and prohibiting covered personnel from involvement in wholesale or retail electricity transactions, requiring the protection of confidential information from third parties.

#### **D. Rule 3755(d) Transmission Rates**

SPP establishes transmission rates through its OATT, ensuring non-discriminatory and cost-effective transmission service for both market and non-market participants. The SPP OATT governs the pricing structure, methodology for cost allocation, and mechanisms to minimize rate pancaking.

The SPP Expansion Filing describes certain changes to the OATT that allow the Expansion Members to be integrated into the SPP RTO. In particular, the Expansion Filing describes the creation of an SPP East Region and SPP West Region, with separate cost allocation and rate calculations applicable to the two regions.<sup>58</sup>

Under the SPP OATT (as modified by the Expansion Filing), transmission

---

<sup>57</sup> Available at <https://opsportal.spp.org/documents/swpp/general/conduct.html>.

<sup>58</sup> See Expansion Filing at 17-25.



customers will pay only a single access charge within the SPP footprint, rather than separate charges for each transmission provider when power moves across multiple service areas.

Transmission Rates are further covered in the Direct Testimony of Tri-State witness Ryan J. Hubbard.

#### **E. Rule 3755(e) Reliability and Resource Adequacy**

Reliability and resource adequacy requirements are outlined in Attachment AA of SPP's OATT.<sup>59</sup> SPP requires that each Load Responsible Entity ("LRE") maintain sufficient capacity to meet its forecasted Summer and Winter Net Peak Demand plus a base planning reserve margin ("PRM"). Additionally, in accordance with SPP's proposed Accredited Capacity ("ACAP") PRM<sup>60</sup> concept (which is still pending at FERC) for resource planning, each LRE will be required to provide accredited capacity to meet the ACAP PRM based on that entity's conventional resources' Performance-Based Accreditation ("PBA") and Fuel Assurance ("FA") Incremental Outage Impact ("IOI"), and the Electric Load Carrying Capability ("ELCC")<sup>61</sup> values for renewable and energy storage resources. Real-time reliability and planning for resource adequacy are discussed in the Direct Testimony of Tri-State witnesses Daniel Walter and Lisa Tiffin, respectively.

#### **F. Rule 3755(f) Costs and Benefits Analysis**

Tri-State participated in a joint study of the benefits of SPP RTO with the then-

---

<sup>59</sup> See <https://www.spp.org/documents/58597/attachment%20aa%20tariff.pdf>.

<sup>60</sup> See file number 05, <https://www.spp.org/Documents/71721/RSC%20Special%20Meeting%2020240610%20v2.zip>.

<sup>61</sup> See SPP ELCC Methodology Transmittal Letter: [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20240223-5157&optimized=false&sid=f8a99705-c8e8-4b55-aa32-92acb7d403a2](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20240223-5157&optimized=false&sid=f8a99705-c8e8-4b55-aa32-92acb7d403a2).

current WEIS participants in 2022.<sup>62</sup> Additionally, in 2023 Tri-State engaged the Brattle Group to perform an additional Tri-State-specific analysis of the SPP RTO benefits updated to reflect WEIS expansion and potential GHG benefits.<sup>63</sup> The costs and benefits of RTO participation are further discussed in the Direct Testimony of Daniel Walter.

### **G. Rule 3755(g) Market Governance**

SPP is a nonprofit corporation regulated by FERC and governed by an independent Board of Directors. SPP members provide input on RTO decision-making through participation in SPP's organizational groups.<sup>64</sup> Section 3 of SPP's bylaws addresses appointment, terms, attendance and proxies, quorum, voting, and other key aspects of the organizational groups.<sup>65</sup>

SPP's process for modifying market protocols, operating or planning criteria, business practices, the tariff, or other governing documents is referred to as a Revision Request ("RR"). SPP has a publicly available document on its website that identifies which committees, working groups and task forces are engaged in discussion and approval of each category of RR, depending on the scope and topic.<sup>66</sup> For concepts that are initiated by SPP, an RR is drafted after the concept is voted on by the applicable

---

<sup>62</sup> A publicly available report of the methodologies and results of the study can be found here:

<https://www.wapa.gov/wp-content/uploads/2023/04/2022-spp-rto-brattle-study.pdf>.

<sup>63</sup> The methodologies and results of the study can be found in a publicly available report here:

[https://www.dora.state.co.us/pls/efi/efi.show\\_document?p\\_dms\\_document\\_id=999118&p\\_session\\_id=](https://www.dora.state.co.us/pls/efi/efi.show_document?p_dms_document_id=999118&p_session_id=)

<sup>64</sup> The groups, and the current chairs, vice chairs, and secretaries of the groups, are identified in the public organizational chart, found on SPP's website, here:

[https://www.spp.org/documents/23115/spp\\_group\\_org\\_chart.pdf](https://www.spp.org/documents/23115/spp_group_org_chart.pdf); a link to a brief description of each group, their governing documents, past and upcoming meeting materials, and a list of the current voting members can be found publicly here: <https://www.spp.org/stakeholder-groups/>.

<sup>65</sup> SPP's bylaws are publicly available on their website, here: <https://www.spp.org/spp-documents-filings/?id=18162>, under "Current Bylaws and Membership Agreement Tariff."

<sup>66</sup> This "RR Routing Criteria" checklist can be found on SPP's website here: <https://www.spp.org/spp-documents-filings/?id=21033>; SPP also includes a publicly available document, titled "RR Master List," that identifies all active RRs and which stage of the RR routing they are in. Open and closed RRs can also be found in this same public folder.

committees, working groups, and task forces, including the SPP Board when necessary. For concepts that are initiated by SPP Stakeholders (e.g., Market Participants, Transmission Owners, etc.), the submission of a draft RR initiates review by applicable committees, working groups, and task forces, including the SPP Board when necessary. In February 2025, SPP created a new role supporting governance—its first Executive Vice President of Stakeholder Affairs and Chief Strategy Officer—to lead the administration of SPP’s independent and inclusive stakeholder process, direct the management of the relationships and communications with external stakeholders, in the Eastern and Western Interconnections.

SPP’s organizational meetings are open to the public.<sup>67</sup> SPP also publishes a quarterly stakeholder report summarizing highlights of recent organizational group activity and significant RRs.<sup>68</sup>

In addition, SPP has an independent Market Monitoring Unit (“MMU”) that is responsible for monitoring SPP’s Market and services to ensure SPP’s markets are efficient and fair. Specific duties of the MMU include obtaining objective information about SPP’s markets and services, assessing the behavior of Market Participants, and assessing the behaviors of other markets and services that impact SPP. Additionally, the MMU is responsible for identifying structural problems and design flaws in the operating rules, standards, procedures and practices in SPP markets. The SPP Board of Directors

---

<sup>67</sup> Anyone can register to attend a virtual meeting from SPP’s events calendar webpage, here: <https://www.spp.org/events/>.

<sup>68</sup> The stakeholder reports can be publicly accessed, here: <https://www.spp.org/spp-documents-filings/?id=18367>.

Oversight Committee has adopted a statement on the MMU's independence.<sup>69</sup> Further information on the MMU can be found in Section 3 of Attachment AG to SPP OATT.<sup>70</sup>

#### **H. Rule 3755(h) Emission Reduction Improvements**

Please see Section VI.A.3 of this Application.

#### **I. Rule 3755(i) and § 40-5-108(1)(a)(VII), C.R.S. Stakeholder Process**

SPP's stakeholder process was approved by FERC pursuant to FERC Order No. 719, which generally requires an RTO to include and consider stakeholder views (including minority views) in its decision-making process.<sup>71</sup> Specifically, FERC noted that:

SPP's governance procedures and stakeholder processes satisfy the inclusiveness requirement of Order No. 719. SPP's Board meetings are open to all of its members. Moreover, SPP holds at least one annual members meeting in conjunction with the meeting of its Board. The SPP Board also considers straw votes by SPP's Members Committee before taking action on proposed items. SPP also posts all Board meeting materials in advance of meetings, posts minutes after meetings, and provides contact information for all Board members on its website. These practices demonstrate that customers and other stakeholders have access to SPP's Board to communicate their views.<sup>72</sup>

#### **J. Rule 3755(j) Transmission Planning, Cost Allocation and Expansion**

SPP performs transmission planning through its Integrated Transmission Planning ("ITP") Assessment, which is an annual, approximately 24-month study. The ITP creates a 10-year transmission expansion plan each year, consolidating near-term, 10-year, and NERC transmission planning (TPL-001) assessments into one study. The process aims

---

<sup>69</sup> See [https://spp.org/documents/17118/spp-06-151223-mmuhmmu\\_independence\\_oc\\_statement%2012\\_23\\_15.pdf](https://spp.org/documents/17118/spp-06-151223-mmuhmmu_independence_oc_statement%2012_23_15.pdf).

<sup>70</sup> Available at <https://sppviewer.etariff.biz/tariff>.

<sup>71</sup> *Southwest Power Pool, Inc.*, 133 FERC ¶ 61,069 (2010).

<sup>72</sup> *Id.* at 61,342.

to evaluate and determine the most optimal and essential transmission projects based on the economic needs, reliability needs, public policy needs, persistent operation needs, or winter weather needs of the system. FERC approved the most recent iteration of SPP's ITP process in FERC Order No. 161 finding that the ITP processes are "just and reasonable and remain consistent with the Commission's transmission planning-related requirements under Order Nos. 890 and 1000."<sup>73</sup>

SPP currently uses the Highway/Byway allocation methodology for new transmission facilities that are not direct-assigned or are ineligible for Base Plan funding (i.e., cost allocation). The Highway/Byway methodology allocates transmission costs based on the voltage level of the specific facility. The Highway/Byway allocation methodology was approved by FERC in FERC Order No. 131, where FERC found it to be "a just and reasonable proposal for cost allocation in the SPP region".<sup>74</sup>

Please see the Direct Testimony of Ryan J. Hubbard for further information on transmission planning, cost allocation, and expansion.

#### **K. Rule 3755(k) Interconnection**

##### **1. Overview of SPP OATT GI Procedures.**

Please see Direct Testimony of Ryan J. Hubbard for an overview of the interconnection process.

##### **2. GI Queue Transition Process.**

SPP's GI queue transition process is described in the Transition Western Entities

---

<sup>73</sup> *Southwest Power Pool, Inc.*, 161 FERC ¶ 61,261 (2017).

<sup>74</sup> *Southwest Power Pool, Inc.*, 131 FERC ¶ 61,252 (2010).

into SPP's Generator Interconnection Process document ("GI Document").<sup>75</sup> The application of SPP's Generation Interconnection Procedures ("GIP") to generators and Interconnection Requests transferring to SPP depends on the stage the generator interconnection request ("GIR") has reached. SPP outlines the processes for each potential stage of a GIR transferring to SPP in its GI Document. Prior to April 1, 2026 ("Effective Date"), SPP will send out data requests to gather relevant data needed to successfully transfer Expansion Member GI projects into SPP. Additionally, SPP's transition process will include onboarding, training, and testing for SPP systems and application processes. Beginning on the Effective Date, interconnection customers will need to submit all new requests for interconnection of resources in the SPP western interconnection footprint to the SPP Open Cluster Window.

Currently, SPP's interconnection queue backlog is on track to be cleared prior to April 1, 2026, as a result of GIP reforms adopted by SPP to discourage speculative projects from proceeding in the queue.<sup>76</sup> In the event that SPP has not cleared its existing generator interconnection queue backlog as of April 1, 2026, SPP has committed to making a filing with FERC to establish a separate interconnection queue for requests seeking to interconnect to an Expansion Members' transmission system.<sup>77</sup>

The Direct Testimony of Ryan J. Hubbard further discusses the GI queue transition process.

---

<sup>75</sup> See [http://www.oasis.oati.com/woa/docs/TSGT/TSGTdocs/GI\\_RTOE\\_Transition\\_to\\_SPP\\_3-26-2024.pdf](http://www.oasis.oati.com/woa/docs/TSGT/TSGTdocs/GI_RTOE_Transition_to_SPP_3-26-2024.pdf).

<sup>76</sup> See, pgs. 38,45,46, *Southwest Power Pool, Inc.*, 190 FERC ¶ 61,169 (2025).

<sup>77</sup> See [http://www.oasis.oati.com/woa/docs/TSGT/TSGTdocs/GI\\_RTOE\\_Transition\\_to\\_SPP\\_3-26-2024.pdf](http://www.oasis.oati.com/woa/docs/TSGT/TSGTdocs/GI_RTOE_Transition_to_SPP_3-26-2024.pdf).

## VII. INFORMATION REQUIRED BY RULE 3002(b)

1. Name and Address of Applicant. The Applicant is Tri-State Generation and Transmission Association, Inc. Tri-State's principal office is located at 1100 W. 116<sup>th</sup> Avenue, Westminster, CO 80234-2814. Tri-State's mailing address is: Tri-State Generation and Transmission Association, Inc., P.O. Box 33695, Denver, CO 80233-0695.

2. Name Under Which Applicant Provides Service in Colorado. Tri-State conducts operations under its corporate name. Tri-State is incorporated under the laws of the state of Colorado.

3. Representatives to Whom Inquiries Concerning the Application Should Be Made. Copies of all notices, other correspondence, and all inquiries concerning this Application should be sent to:

Elizabeth C. Stevens #45864  
Senior Regulatory Counsel  
Tri-State Generation and Transmission  
Association, Inc.  
1100 W. 116<sup>th</sup> Ave.  
Westminster, CO 80234  
(303) 254-3534  
[liz.stevens@tristategt.org](mailto:liz.stevens@tristategt.org)

Dietrich C. Hoefner  
Womble Bond Dickinson (US) LLP  
1601 19<sup>th</sup> Street, Suite 1000  
Denver, CO 80202  
(303) 623-9000  
[dietrich.hoefner@wbd-us.com](mailto:dietrich.hoefner@wbd-us.com)

4. Agreement to Comply with 4 CCR 723-3002(b)(IV)-(VI). Tri-State has read and agrees to abide by the provisions of subparagraphs (b)(IV) through (b)(VI) of Rule 3002 of the Electric Rules, consistent with the Commission's jurisdiction.

5. Description of Existing Operations and General Colorado Service Area. Tri-State is engaged in the generation, transmission, and sale of wholesale electric energy and capacity to its Utility Members within the states of Colorado, Nebraska, New Mexico, and Wyoming. Tri-State owns interests in electric generating facilities in the states of Arizona, Colorado, New Mexico, and Wyoming, and it owns transmission facilities in the states of Colorado, Nebraska, New Mexico, and Wyoming. As a provider of wholesale generation and transmission services, Tri-State does not have certificated service territory in Colorado.

6. Balance Sheet and Income Statement. A copy of Tri-State's 2024 Annual Report (which includes a balance sheet and cash flow and operations statements) is attached hereto and incorporated herein as **Attachment E**.

7. Location of Hearing. Rule 3744(f) requires at least one public comment hearing, but Rule 3744(f) does not contemplate any evidentiary hearing. Tri-State requests that this Application be decided by the Commission without an evidentiary hearing, pursuant to Rule 3744(f), and processed as expeditiously as possible. To the extent the Commission determines to hold an evidentiary hearing in this proceeding, Tri-State requests that it be held remotely or at the Commission's offices in Denver, Colorado.

8. Acknowledgment. Tri-State has read and agrees to abide by the provisions of subparagraphs (b)(XI)(A) through (C) of Rule 3002 of the Electric Rules, consistent with the Commission's jurisdiction.

9. Statement Under Oath. This Application is verified by Lisa Tiffin, Senior Vice President, Energy Management, as evidenced by the Attestation attached hereto as **Attachment F**.



#### **VIII. INFORMATION REQUIRED BY RULE 3002(c)**

1. A copy of Tri-State's Articles of Incorporation, with all amendments to date, is attached hereto and incorporated herein as **Attachment G**.
2. The names of Tri-State's directors, officers, and Colorado agent for service are set forth on the list attached hereto and incorporated herein as **Attachment H**.
3. The names and addresses of Tri-State's members are shown on the list attached hereto and incorporated herein as **Attachment I**. The service territories of Tri-State's Member Systems are shown on the map attached hereto and incorporated herein as **Attachment J**.

#### **IX. CONCLUSION**

WHEREFORE, Tri-State respectfully requests the Commission issue an order finding that SPP RTO is a statutory OWM as defined in Rule 3752(n) and, pursuant to Rule 3754(d), find that Tri-State's decision to expand its participation in SPP RTO is in the public interest, as set forth herein.

Submitted this 16th day of June 2025.

**WOMBLE BOND DICKINSON (US) LLP**

s/ Dietrich C. Hoefner  
Dietrich C. Hoefner, #46304  
Michelle A. Gaeng, #58231  
Womble Bond Dickinson (US) LLP  
1601 19th Street, Suite 1000  
Denver, CO 80202  
Phone: (303) 623-9000  
Email: [Dietrich.Hoefner@wbd-us.com](mailto:Dietrich.Hoefner@wbd-us.com)  
[Michelle.Gaeng@wbd-us.com](mailto:Michelle.Gaeng@wbd-us.com)

and

Elizabeth C. Stevens, #45864  
Senior Regulatory Counsel  
Tri-State Generation and Transmission  
Association, Inc.  
1100 W. 116<sup>th</sup> Ave.  
Westminster, CO 80234  
(303) 254-3534  
[liz.stevens@tristategt.org](mailto:liz.stevens@tristategt.org)

***Attorneys for Applicant Tri-State Generation and  
Transmission Association, Inc.***